## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FirstMerit Bank, N.A, successor in	Ĺ
interest to Midwest Bank and Trus	$\operatorname{st}$
Company,	

Plaintiff,

Case No. 13-cy-6017

vs.

Sandra Grantham, et al.,

Defendants.

## PETITION TO REVIVE JUDGMENT

The Huntington National Bank<sup>1</sup> ("Huntington"), successor by merger with FirstMerit Bank, N.A., by and through its attorneys, respectfully requests that this Court revive the judgment previously entered against Sandra Grantham (the "Judgment Debtor"). In support, Huntington respectfully states as follows:

- 1. On February 6, 2014, this Court entered a judgment (the "Judgment") in favor of FirstMerit Bank, N.A. and against the Judgment Debtor in the amount of \$110,242.82 (Dkt. No. 26).
- 2. On or about June 1, 2018, Huntington and the Judgment Debtor entered into a settlement agreement to resolve the debt due under the Judgment. The settlement agreement called for the Judgment Debtor to make settlement payments to Huntington over time. The Judgment Debtor is actively making settlement payments, but her obligations thereunder are ongoing.
- 3. Since entry of the Judgment Order, statutory interest, costs, and fees have accrued as follows:

Interest:	\$801.99
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<sup>&</sup>lt;sup>1</sup> Effective August 16, 2016, FirstMerit Bank, N.A. merged with and into The Huntington National Bank. Contemporaneous with the filing of this petition, Huntington is filing a motion to substitute in as plaintiff.

Costs:	\$311.45
Attorneys' Fees:	\$0

- 4. To date, Huntington has received \$44,547.00 toward satisfaction of the Judgment.
- 5. The current amount due on the Judgment is \$66,809.26 (the "Current Judgment Balance"). Should the Judgment Debtor fully comply with the settlement agreement, however, she will not be required to pay the entire Current Judgment Balance.
- 6. Pursuant to 735 ILCS 5/2-1602, a judgment may be revived to permit its continued enforcement.
- 7. Huntington respectfully requests that this Court revive the Judgment entered against the Judgment Debtor.
- 8. Thirty days' notice of this petition has been provided to the Judgment Debtor as required by 735 ILCS 5/2-1602 (c).

WHEREFORE, Huntington respectfully requests that this Court grant the relief sought herein and such further relief as is appropriate under the circumstances.

Dated: December 22, 2020

Respectfully submitted,

The Huntington National Bank, successor by merger with FirstMerit Bank, N.A.

By: <u>/s/ Thomas H. Griseta</u>
One of Its Attorneys

William J. Factor (6205675)
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